

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission,) Application No. C-3049
on its own motion, to conduct an)
investigation into possible)
solutions for extending the life)
of area codes 308 and 402.)
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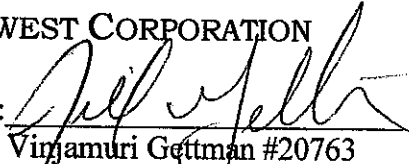
NOTICE OF FILING

Qwest Corporation attaches hereto the DIRECT TESTIMONY OF ANN MARIE CEDERBERG which it submits for filing with the Nebraska Public Service Commission with this Notice of Filing.

Dated Monday, May 22, 2006.

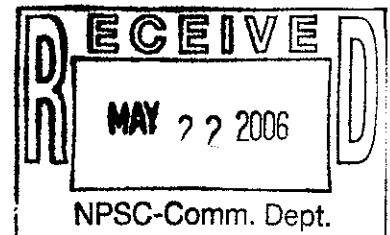
Respectfully submitted,

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BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

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| In the Matter of the Commission, on its own motion, to conduct an investigation into possible solutions for extending the life of area codes 308 and 402 | Application No. C-3049 ORDER IMPLEMENTING MANDATORY THOUSANDS BLOCK NUMBER POOLING IN CERTAIN RATE CENTERS OF THE 402 AREA CODE AND SETTING A HEARING |
| DIRECT TESTIMONY OF ANN MARIE CEDERBERG | |

Q. PLEASE IDENTIFY YOURSELF AND GIVE US AN OVERVIEW OF YOUR WORK EXPERIENCE.

A. I am Ann Marie Cederberg. I am employed by Qwest Corporation as a Director in Network Public Policy. I have been employed in the telecommunications industry for over 28 years. I began my career in 1978 with Western Electric, then The Mountain States Telephone and Telegraph Company, Mountain Bell, which later became part of U S WEST Communications, Inc. and now with Qwest Communications, International. I have been employed within network operations, currently known as the Local Network Organization for the last 11 years. As an employee of the Local Network Organization, I had responsibility for projects that were designed to ensure and maintain adequate levels of network capacity within the central offices as well as outside plant. My Local Network Organization responsibilities have provided me with an extensive background and in-depth experience in all aspects of the public switched telephone network.

In May 2005, I accepted my current position as a Director within the Network Policy Group, where I am responsible for ensuring compliance with the Telecommunications Act of 1996 (the "Act") and state regulations. My responsibilities include, but are not limited to, providing representation before the Federal Communications Commission ("FCC") and state commissions on issues relating to the network elements and architectures for both wireline and wireless networks. I am a graduate of the University of Denver and have attended over 3500 hours of continuing education in telecommunications.

Q. PLEASE PROVIDE SOME BACKGROUND ON THIS DOCKET AND THE RECENT FCC AND NEBRASKA PUBLIC SERVICE COMMISSION ORDERS IN DOCKET C-3049.

A. The Nebraska Public Service Commission ("NE PSC"), its Staff and the industry, which includes Qwest, has been working cooperatively to address the exhaust of Nebraska area codes. In 1999 the North American Numbering Plan Administration ("NANPA") notified the industry that the area code 402 was expected to exhaust in the fourth quarter of 2000.

In July 2000 the NE PSC received permission to order a pooling trial in the 402 area code. Shortly thereafter, as directed by the Federal Communications Commission ("FCC") permanent number pooling was implemented in the Omaha Metropolitan Statistical Area ("MSA") area,

along with other number conservation initiatives. Furthermore, the state of Nebraska conducted workshops to investigate other potential methods to better utilize existing number resources. Since that time, several petitions have been filed with the FCC by different state commissions, including Nebraska, asking for permission to deploy mandatory number pooling beyond the top 100 MSAs. On February 24, 2006, the FCC released *Numbering Resource Optimization, Order and Fifth Notice of Proposed Rule Making*, CC Docket No. 99-200 (2006) granting the NE PSC "the authority to implement mandatory thousands-block pooling in the 402 NPA".

Q. WHAT HAS QWEST DONE TO HELP DELAY THE EXHAUST OF AREA CODE 402 AND CONSERVE NUMBERING RESOURCES FOR THE CITIZENS OF NEBRASKA?

A. Since 2000, Qwest has implemented various conservation methods aimed at delaying the exhaust of the 402 area code. For Example, Qwest participated in Thousand Block Number Pooling during the FCC mandated trial in the Omaha MSA. In order to further delay the exhaust of the 402 area code, Qwest also chose to deploy the number pooling capability in every switch in area code 402. Additionally, Qwest utilizes tools, like sequential number assignments that enable Qwest to perform internal reviews of each and every telephone number in all of its area codes to verify the status and ensure proper management of the number inventory. As a direct result, Qwest has donated blocks of numbers in 25 of its 28

rate centers in area code 402 and in some cases; it has returned entire NXXs back to the NANPA and Pooling Administrator¹. Furthermore, Qwest has created thousand block pools outside of the Omaha MSA where numbers have been donated to the pools. In one instance, rather than donate 9 blocks to the pool, we worked with the Commission Staff and were able to actually transfer an entire central office code to another carrier for purposes of allowing that carrier to establish a Local Routing Number ("LRN") without having to open a new NXX.² Qwest has deployed number portability and number pooling in 36 of its 39 switches in 25 of its 28 rate centers in 402 alone. Until recently, the remaining 3 switches and rate centers did not have competing carriers or a need to deploy pooling.

Q. WHAT ELSE HAS QWEST DONE TO HELP DELAY EXHAUST OF 402?

A. Qwest has voluntarily completed several Rate Center Consolidations, reducing the number of rate centers where new entrants would have to get NXX codes and LRNs.

Q. YOU MENTIONED QWEST HAS DEPLOYED NUMBER POOLING. EXACTLY HOW MANY BLOCKS OF NUMBERS HAS QWEST DONATED TO THE POOLS?

¹ Qwest has returned a total of 8 fully recovered codes between 2001 and 2004. These are not included as donations.

² Qwest transferred 402-590 to Pinpoint Communications in December 28, 2005 allowing Pinpoint to establish an LRN without having to open a new NXX in the 402 area code. Qwest had to port 60 customers back to itself in order to allow our customers to keep their existing telephone numbers.

A. Qwest has donated 276³ blocks of 1000 numbers back to the rate center pools in area code 402. In addition, Qwest has returned 8 full NXXs in area code 402 since 2001.

Q. WHY WAS QWEST IN A POSITION TO DONATE OR RETURN SO MANY NUMBERS?

A. Prior to divestiture, Qwest (f.k.a. U.S. West, Mountain Bell) was the only service provider in Nebraska, and numbering shortages were not a concern until competitive carriers were established and started requesting numbering resources. During that period, a full NXX code with 10,000 numbers was often assigned to a switch serving a small community of only a few hundred people. Even with the apparent under-utilization of numbering resources, there were plenty of numbers still available. In fact, up until wireless carriers started to enter the marketplace (later to be joined by competitors for wire line services) number conservation was not a concern. As such, incumbent local exchange carriers (like Qwest) found they had many unused numbers that could not be moved or utilized elsewhere because the only way to obtain numbers was by assigning them in increments, or codes, of 10,000 at a time.

Today, this situation still exists in the rural parts of the state. Small rate centers exist for the smaller communities in the rural outlying areas.

It was during the latter part of the 1990s when numbering resources were

³ This number does not match the PA Block Donation Report because the PA report does not include the earlier donations from the 2001 pooling trial.

becoming scarcer and the forecasts predicted escalating number utilization Qwest began to implement numerous conservation tools in order to recover or avoid the unnecessary use of telephone numbers. For example, Qwest recommended area code "overlays" when there was a need for area code relief. This simple process allows customers to keep their numbers when they move into an area with a different NPA. This has the additional benefit of not requiring the duplication of numbers in the new area code. Qwest consolidated rate centers, where appropriate, to reduce the uses of NXXs and to better use the existing numbers. However, once wireless and local competition started to take off, the demand for telephone numbers grew almost exponentially as we moved into the late 1990s. This created a strain on the existing North American Numbering Plan ("NANP") resources, threatening to shorten the life of the entire NANP and moving the telephone number exhaust date of the NANP up to as early as 2007. In 1996, the Telecommunications Act established the North American Numbering Council ("NANC") to act as an advisory committee to the FCC on numbering related matters. After researching the numbering situation, the NANC began to report on the condition of the NANP and submitted several recommendations on how to better manage and control the remaining numbering resources. From those recommendations, the FCC ordered the industry to implement several industry conservation measures, the most significant and costly being Number Pooling. These measures began to slow down and control the

rush by new entrants to obtain entire NXXs for each rate center where they planned to do business. Under the greater scrutiny of both the FCC and the State Commissions, many carriers discovered they had over-forecasted their need for numbers and began to return many NXXs. Then as number pooling evolved and expanded from trials to full deployment in the top 100 MSAs more and more blocks of numbers were turned over to the Pooling Administrator and were available for use by other carriers.

Q. WHY IS QWEST FILING THIS TESTIMONY?

A. Qwest is filing this testimony to demonstrate that there is no need to expand the mandatory number pooling system that is currently in place. Rather, as outlined above, the commission should continue to permit regulators and the industry to work together to resolve numbering issues. In this case, the Nebraska Public Service Commission has obtained permission to deploy thousand block pooling throughout the Omaha MSA, along with industry support and with the benefit going to the consumers.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes it does. However, I will be available at the hearing of this matter to answer any questions the Commission may have, and respond to other testimony filed in this docket, as may be appropriate.